

# Milbank

NOLA B HELLER

Partner

55 Hudson Yards | New York, NY 10001-2163

T: +1 (212) 530-5108

nheller@milbank.com | milbank.com

September 25, 2024

## VIA ECF AND EMAIL

Honorable Alvin K. Hellerstein, United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1050  
New York, NY 10007-1312

*So ordered*  
*9-26-24*  
*Alvin K. Hellerstein*

Re: *United States of America v. Martin Silver*, S1 20 Cr. 360 (AKH)

Dear Judge Hellerstein:

The government filed a turnover motion in the above-captioned case yesterday. Mr. Silver strongly opposes the government's motion, which seeks relief that is contrary to the terms of the judgment entered by this Court at Mr. Silver's sentencing, in violation of applicable law. Accordingly, Mr. Silver will be filing a detailed response to the government's motion.

After having conferred with the government, the parties jointly propose that Mr. Silver's response to the motion be due on October 25, 2024, and that the government's reply be due thirty days following the filing of the response, on November 25, 2024.

Respectfully Submitted,



Nola B. Heller

MILBANK LLP

55 Hudson Yards

New York, NY 10001

(212) 530-5000

*Counsel for Martin Silver*

Cc (via ECF): AUSA Melissa Childs

MILBANK LLP

NEW YORK | LOS ANGELES | WASHINGTON, D.C. | SÃO PAULO | FRANKFURT  
LONDON | MUNICH | BEIJING | HONG KONG | SEOUL | SINGAPORE | TOKYO